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Before the

FEDERAL COMMUNICATIONS COMMISSION

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Washington, D.C. 20554

SEP 13 1994

In Re Applications of) MM Docket MCOMMONICATIONS COMMISSION)
TRINITY BROADCASTING OF FLORIDA, INC.) BRCT-911001LY
For Renewal of License for Television Station WHFT(TV) Miami, Florida)))
GLENDALE BROADCASTING COMPANY	BPCT-911227KE
For Construction Permit Miami, Florida	DOCKET FILE COPY ORIGINAL

To: Hon. Joseph Chachkin
Administrative Law Judge

CONSENT MOTION FOR EXTENSION OF TIME

Trinity Broadcasting of Florida, Inc.; Trinity Christian Center of Santa Ana, Inc. d/b/a Trinity Broadcasting Network; National Minority T.V., Inc.; and Spanish American League Against Discrimination (hereinafter collectively referred to as "Movants"), by their counsel, respectfully request that the date for filing reply findings of fact and conclusions of law in this proceeding be extended to October 7, 1994. Movants will request no further extensions in this matter.

In support of this motion, Movants respectfully state as follows:

1. Reply findings of fact and conclusions of law are currently scheduled to be filed in this proceeding on Monday,

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September 26, 1994. By this motion, Movants respectfully request an extension of that date until the end of the following week, Friday, October 7, 1994. Movants require this extension due to the prodigious record in this case and the extensive number of issues that have been raised in proposed findings of fact and conclusions of law which must be addressed in reply. Due to the extent of the proposed findings and the record, this is a special case in which the modest additional time requested will be of great value in enabling the parties to submit helpful replies that will focus the relevant facts and law, rather than provide essentially generalized argument which is mostly all that could be accomplished by the current due date. Accordingly, this is a unique situation in which the grant of a modest amount of additional time, by allowing a specific analysis of the law and the record, is likely to reduce the ultimate amount of time required to resolve the proceeding and will benefit the public interest by assisting the Presiding Judge's assessment of the merits.

2. Counsel for the Mass Media Bureau and for Glendale Broadcasting Company have graciously authorized the undersigned to state that they consent to the grant of this motion. As indicated, the Movants will request no further extensions.

For the foregoing reasons, Movants respectfully request that the date for filing reply findings of fact and conclusions of law be extended to October 7, 1994.

Respectfully submitted,

TRINITY BROADCASTING OF FLORIDA, INC.; TRINITY CHRISTIAN CENTER OF SANTA ANA, INC., d/b/a TRINITY BROADCASTING NETWORK,

NATIONAL MINORITY TV, INC.

By:

Howard A. Topel

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Their Counsel

SPANISH AMERICAN LEAGUE AGAINST DISCRIMINATION

Rv:

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Its Counsel

September 13, 1994

CERTIFICATE OF SERVICE

I, Joan M. Trepal, a secretary in the law firm of Mullin, Rhyne, Emmons and Topel, hereby certify that on this 13th day of September, 1994, copies of the foregoing "Consent Motion for Extension of Time" were sent by first class mail, postage prepaid, to the following:

- * The Honorable Joseph Chachkin Administrative Law Judge Federal Communications Commission 2000 L Street, N.W.--Room 226 Washington, D.C. 20554
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^{*} Hand Delivered.